

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION**

FEDERAL TRADE COMMISSION,
STATE OF CALIFORNIA, STATE OF
COLORADO, STATE OF ILLINOIS,
STATE OF INDIANA, STATE OF IOWA,
STATE OF MINNESOTA, STATE OF
NEBRASKA, STATE OF OREGON,
STATE OF TENNESSEE, STATE OF
TEXAS, STATE OF WASHINGTON, and
STATE OF WISCONSIN,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG,
SYNGENTA CORPORATION,
SYNGENTA CROP PROTECTION, LLC,
and CORTEVA, INC.,

Defendants.

Case No. 1:22-cv-00828-TDS-JEP

**CONSENT MOTION FOR
EXTENSION OF TIME FOR
PLAINTIFFS' MOTION TO
COMPEL REPLY BRIEF**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 6.1(a), Plaintiffs Federal Trade Commission and the states of California, Colorado, Illinois, Indiana, Iowa, Minnesota, Nebraska, Oregon, Tennessee, Texas, Washington, and Wisconsin, acting by and through their respective Attorneys General ("Plaintiffs"), hereby move the Court for an order extending the time to file a reply brief in support of Plaintiffs' Motion to Compel Discovery of Syngenta Defendants¹ to fourteen (14) days after Syngenta files its response. Syngenta consents to this extension of time.

¹ Defendants Syngenta Crop Protection AG, Syngenta Corporation, and Syngenta Crop Protection, LLC (collectively, "Syngenta" or the "Syngenta Defendants").

In support of this Motion, and showing good cause, Plaintiffs state the following:

1. On June 25, 2024, Plaintiffs filed a Motion to Compel Discovery of Syngenta Defendants (Doc. 217).
2. On June 27, counsel for Syngenta conferred with counsel for Plaintiffs regarding an extension of time for Syngenta Defendants to file a response to Plaintiffs' Motion to Compel, together with a reciprocal extension of time for Plaintiffs to file a reply to Syngenta's response. Plaintiffs consent to Syngenta's requested time extension of seven (7) days to file a response to Plaintiffs' Motion to Compel, and Syngenta consents to a seven (7) day extension of time for Plaintiffs to file a reply to Syngenta's response.
3. On July 1, 2024, Syngenta moved the Court for an extension of seven days for its response, through and including July 16, 2024.

Therefore, Plaintiffs respectfully move this Court to enter an Order granting Plaintiffs an extension of seven (7) days to reply to Syngenta's response (giving Plaintiffs fourteen (14) days to reply to Syngenta's response). Syngenta consents to this extension. The time for this reply has not expired, and this motion is made in good faith and not for the purpose of delay.

Dated: July 3, 2024

Respectfully submitted,

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